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Attorneys for Plaintiff ZooBuh, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

ZOOBUH, INC., a Utah Corporation

Plaintiff,

vs.

RAINBOW INTERNATIONAL CORP., a
Colorado Corporation et al.,

Defendants.

**EX PARTE MOTION FOR HEARING
TO IDENTIFY JUDGMENT DEBTORS'
PROPERTY**

Case No.: 2:14cv00477 DN

Judge David Nuffer

ZooBuh, Inc. through its attorneys, hereby states as follows:

- (1) On Feb. 11, 2015, the Court entered a Judgment in the amount of \$6,741,701.32 against Defendant Rainbow International Corp., who is the judgment debtor.
- (2) The judgment debtor has not fully satisfied this judgment.
- (3) ZooBuh is presently unable to use the remedies provided by law for the collection of the judgment because it do not have sufficient information about the debtor's property.
- (4) Under Fed. R. Civ. P. 64 and URCP 64(c)(2), ZooBuh requests that the court schedule a hearing and order the debtor to attend and answer under oath questions about the debtor's property and to bring to the hearing all records about financial accounts, accounts receivable, real property, business entities, stocks, units, and any other property in which the debtors have an interest.

- (5) ZooBuh will serve, via email to Don Corn, CEO of Rainbow International at support@rainbowinternationalcorporation.com, the attached Questions about Judgment Debtors' Property (Exhibit A) with the order scheduling the hearing. If the debtors serve Answers to the questions on counsel for ZooBuh at least 3 business days before the hearing, and if ZooBuh is satisfied that the debtors have answered the questions fully and truthfully, ZooBuh will cancel the hearing and notify the debtors of the cancellation.
- (6) Under Fed. R. Civ. P. 64 and URCP 64(c)(3), ZooBuh request that the Court order the judgment debtors not to sell, transfer or dispose of the debtors' non-exempt property.

ZooBuh has not included any non-public information in this document.

ZooBuh, though counsel, hereby declares under penalty of Utah Code Section 78B-5-705 that everything stated in this document is true and correct.

Date 2/10/2016 Sign here ► /s/ Jordan K. Cameron
Jordan K. Cameron
Typed or printed name Attorney for Plaintiff